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Proposed Counsel to the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., *et al.*,) Case No. 22-10943 (MEW)
Debtors.¹) (Jointly Administered)
)
) Re: ECF No. 317

**CERTIFICATE OF NO OBJECTION REGARDING
APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION
OF McDERMOTT WILL & EMERY LLP AS COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VOYAGER
DIGITAL HOLDINGS, INC., ET AL., EFFECTIVE AS OF JULY 22, 2022**

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), and in accordance with the *Notice of Application for Order Authorizing the Employment and Retention of McDermott Will*

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax
identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and
Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.'s and Voyager Digital
Ltd.'s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager
Digital, LLC's principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

& Emery LLP as Counsel to the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al., Effective as of July 22, 2022 [Docket No. 317] (the “Notice”), the undersigned counsel for the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al. (the “Committee”) in the above-captioned chapter 11 cases hereby certifies as follows:

1. On August 22, 2022, the Committee filed the *Application for Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel to the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al., Effective as of July 22, 2022* [Docket No. 317] (the “Application”).

2. The Notice and Application were served by undersigned counsel to the Committee as reflected in the certificate of service attached to and filed with the Notice and Application.

3. Pursuant to the Notice, the deadline for parties to object or file responses to the Application was September 6, 2022 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

4. Local Rule 9075-2 provides that the Application may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the entity that filed the Application complies with such rule.

5. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline, and the undersigned counsel hereby certifies that as of the date hereof, no objection or other response to the Application has been filed or served pursuant to the Notice.

6. Accordingly, the undersigned counsel requests entry of the proposed order attached hereto as Exhibit A (the “Proposed Order”) at the Court’s earliest convenience.

7. If not entered prior to the hearing, the Committee will seek entry of the proposed order at the telephonic-only hearing scheduled for 2:00 p.m., prevailing Eastern Time, on September 13, 2022, before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
September 12, 2022

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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